

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION
CIVIL ACTION NO. 3:21-cv-03302-JMC-TJH-RMG

THE SOUTH CAROLINA STATE)
CONFERENCE OF THE NAACP,)

and)

TAIWAN SCOTT, on behalf of)
himself and all other similarly)
situated persons,)

Plaintiffs,)

v.)

HENRY D. MCMASTER, in his)
official capacity as Governor)
of South Carolina; THOMAS C.)
ALEXANDER, in his official)
capacity as President of the)
Senate; LUKE A. RANKIN, in his)
official capacity as Chairman)
of the Senate Judiciary)
Committee; JAMES H. LUCAS, in)
his official capacity as Speaker)
of the House of Representatives;)
CHRIS MURPHY, in his official)
capacity as Chairman of the)
House of Representatives)
Judiciary Committee; WALLACE)
H. JORDAN, in his official)
capacity as Chairman of the)
House of Representatives)
Elections Law Subcommittee;)
HOWARD KNAPP, in his official)
capacity as interim Executive)
Director of the South Carolina)
State Election Commission; JOHN)
WELLS, Chair, JOANNE DAY,)
CLIFFORD J. EDLER, LINDA MCCALL,)
and SCOTT MOSELEY, in their)
official capacities as members)
of the South Carolina Election)
Commission,)

Defendants.)

DEPOSITION

OF

STEVE A. LOVE

1 Q. Are you currently employed there?

2 A. No, I am retired.

3 Q. Are you a member of any civil rights organizations?

4 A. NAACP, if that is considered a civil rights
5 organization.

6 Q. Okay. How long have you been a member of the NAACP?

7 A. Decades, I would say 30 years or better.

8 Q. Okay. What is your position in that organization?

9 A. I don't have one now. I work with -- I'm an active
10 member, but I don't hold a position.

11 Q. Okay. Have you held a position in the past?

12 A. Yes, I am a former president, former South Carolina
13 State Conference Executive Board member as well.

14 Q. So, you are not employed by the NAACP; you are just
15 a member, right?

16 A. That is right.

17 Q. Have you had any discussion with the NAACP about
18 this litigation, about the House Reapportionment
19 Plan litigation?

20 A. No.

21 Q. How long have you known Brenda Murphy, the President
22 of the South Carolina NAACP?

23 A. I'm going to say 15, 20 years. We work together.

24 Q. Okay. Have you ever spoken with Brenda Murphy about
25 redistricting?

1 A. Excuse me?

2 Q. How were you involved?

3 A. Actually, we sued the school district, York County,
4 about redistricting.

5 Q. So, have you been involved in redistricting in any
6 other state other than South Carolina?

7 A. No, not that I recall.

8 Q. Were you involved in any in the SCNAACP's decision
9 to bring a lawsuit against the South Carolina House
10 Reapportionment Plan?

11 A. No.

12 Q. Do you know who made the decision to bring
13 litigation?

14 A. No.

15 Q. Did any person affiliated with the SCNAACP speak
16 with you about being a plaintiff in the lawsuit?

17 A. Can you say that one again? You kind of broke up.

18 Q. Let me rephrase that. Did anyone approach you about
19 being a plaintiff in this lawsuit?

20 A. No.

21 Q. Did you help identify any prospective witnesses for
22 this lawsuit?

23 A. No.

24 Q. Generally, are you familiar with the traditional
25 redistricting principles in South Carolina?

1 A. No, I don't.

2 Q. Generally, why was a reapportionment committee
3 formed?

4 A. I'm not sure.

5 Q. Do you know generally when the Reapportionment
6 Meetings began?

7 A. I'm going to say last year, February, January,
8 February, somewhere in there.

9 Q. All right. When you were participating in these
10 meetings, were you providing any talking points or
11 scripts?

12 A. Could you explain that a little more? I mean...

13 Q. Like, you had an agenda, right?

14 A. Right.

15 Q. Well, essentially did you have like an agenda but
16 more information, you know, about those points?

17 A. From the chair, from me? That's what -- is that
18 what ---

19 Q. Yes.

20 A. No, I followed the agenda basically. I just
21 followed the agenda. I carried the meetings.

22 Q. I got you. Okay. I'm just going to ask you this:
23 from your recollection, during these meetings, did
24 anyone discuss filing litigation against the House
25 plan, the House Reapportionment Plan?